

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

**DAY PITNEY LLP**

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Travelers Property Casualty Company of America

In re:

MARINE ENVIRONMENTAL REMEDIATION  
GROUP LLC, et al.

Debtors.

Marine Environmental Remediation Group LLC  
and MER Group Puerto Rico LLC,

Plaintiffs,

vs.

Starr Indemnity & Liability Company and  
Travelers Property Casualty Company of America,

Defendants.

Chapter 11

Case No. 19-18994-VFP  
(Jointly Administered)

Judge: Vincent F. Papalia, U.S.B.J.

Adv. Pro. No. 20-1141-VFP

Hearing Date: July 7, 2020

**CERTIFICATION OF STEPHEN R. CATANZARO, ESQ. IN SUPPORT OF THE  
MOTION OF TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA  
TO DISMISS, OR, IN THE ALTERNATIVE, TO STAY THIS ADVERSARY  
PROCEEDING**

1. I am an attorney-at-law in the state of New Jersey and of this Court. I am a senior associate in the law firm of Day Pitney LLP, which, along with Willcox & Savage, P.C. and Finazzo Cossolini O'Leary Meola & Hager, LLC, are attorneys for defendant Travelers Property Casualty Company of America ("Travelers"). I submit this Certification in support of Travelers' Motion to Dismiss, or, in the Alternative, to Stay this Adversary Proceeding.

2. Attached hereto as Exhibit A is a true copy of the Amended Complaint filed by debtor/plaintiff Marine Environmental Remediation Group LLC (“MER”) against Travelers on March 29, 2018 in the United States District Court for the District of Puerto Rico under Case No. 3:18-cv-01179 (the “Puerto Rico Action”).

3. Attached hereto as Exhibit B is a true copy of Travelers’ motion to stay the proceedings in the Puerto Rico Action pending the disposition of the litigation pending in the United States District Court for the Southern District of New York between Starr Indemnity & Liability Company and Debtors under Case No. 1:17-cv-09881.

4. Attached hereto as Exhibit C is a true copy of MER’s opposition to Travelers’ motion to stay the proceedings in the Puerto Rico Action.

5. Attached hereto as Exhibit D is a true copy of Travelers’ reply papers in further support of its motion to stay the proceedings in the Puerto Rico Action.

6. Attached hereto as Exhibit E is a true copy of MER’s sur-reply papers in further opposition to Travelers’ motion to stay the proceedings in the Puerto Rico Action.

7. Attached hereto as Exhibit F is a true copy of a screenshot of the docket in the Puerto Rico Action, which reflects at ECF No. 44 the court granting Travelers’ motion to stay the proceedings in the Puerto Rico Action pending disposition of the New York Action.

I hereby certify that the above statements made by me are true. I understand that if any of the above statements made by me are willfully false, I am subject to punishment.

Date: June 9, 2020

/s/ Stephen R. Catanzaro  
STEPHEN R. CATANZARO, ESQ.